## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE: DAVID M. BRIDGES, DEBTOR

CHAPTER 13 PROCEEDING CASE NO. 11-03145-ee

## MOTION TO ALLOW LATE PROOF OF CLAIM

COMES NOW, JPMorgan Chase Bank, National Association, a secured creditor herein, requests the court to allow the filing of a late proof of claim, and in support would show unto the Court the following:

- David M. Bridges ("Debtor") filed a voluntary petition under Chapter 13 of the United States
   Bankruptcy Code on September 9, 2011.
- 2. This Court has jurisdiction over the parties and subject matter of this proceeding.
- JPMorgan Chase Bank, National Association holds a claim against the Debtor, which is secured by certain property located at 205 Village Circle, Canton, Mississippi 39046 ("Property"), as evidenced by a Deed of Trust and a Note.
- 4. Allowing JPMorgan Chase Bank, National Association to file its late claim will not adversely affect Debtors or the bankruptcy estate.
- 5. Debtor's Chapter 13 Plan was confirmed on November 21, 2011.
- Good and sufficient cause exists to allow JPMorgan Chase Bank, National Association to file a late claim.

WHEREFORE, PREMISES CONSIDERED, JPMorgan Chase Bank National Association files this Motion and prays that it be allowed to file a Proof of Claim.

Respectfully submitted SHAPIRO & MASSEY, L.L.P.

/s/ Evan J. Lundy Evan J. Lundy

## CERTIFICATE OF SERVICE

I, J. Gary Massey, of the firm of Shapiro & Massey, L.L.P., do hereby certify that I have this date provided a copy of the foregoing Motion to Allow Late Proof of Claim either by electronic case filing or by United States mail postage pre-paid to the following:

James L. Henley, Chapter 13 Trustee <u>ilhenley@jlhenleych13.net</u>

Mark Ivey Burton, Attorney for Debtors mark@burtonandburtonpllc.com paula@burtonandburtonpllc.com

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David M. & Suzanne Bridges 205 Village Circle Canton, MS 39046

Dated: March 6, 2011

Respectfully submitted SHAPIRO & MASSEY, L.L.P.

/s/ Evan J. Lundy Evan J. Lundy

Presented by:
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